



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NEW YORK 10007-1866

APR 17 2014

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. John Hoffman  
Project Manager - Remediation  
Ashland Inc.  
500 Hercules Road  
Wilmington, DE 19808-1599

Re: LCP Chemical Superfund Site - Bill for Collection No. 2721426S0029

Dear Mr. Hoffman:

Please find enclosed a Bill for Collection No. 2721426S0029, which was prepared by the U.S. Environmental Protection Agency ("EPA"), Region 2, for recovery of EPA response costs for the LCP Chemicals, Inc. Superfund Site ("Site") under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. '9601, et seq. This Bill for Collection is issued to you pursuant to Section XX, paragraph 76 of the Administrative Order on Consent ("AOC"), Index No. II-CERCLA-02-99-2015, signed by EPA and ISP Environmental Services, Inc. ("ISP"). Attachment A to this letter is an itemized cost summary and narrative statement for response costs paid during the time period June 1, 2012 to December 31, 2013.

Please refer to the Superfund Cost Recovery Package Imaging and On-Line System ("SCORPIO\$") report, covering the period June 1, 2012 to December 31, 2013, also enclosed with this letter for your review. EPA reserves the right to recover costs incurred during the time period covered by this bill, but which have not been included in this bill.

Pursuant to Section XX, paragraph 76 of the AOC, you are responsible for remitting payment in the amount of \$196,165.27 within 30 days from receipt of the enclosed bill via electronic funds transfer ("EFT"), as specified below.

You must instruct your bank to remit payment via EFT to EPA's account at the Federal Reserve Bank of New York accompanied by the following information:

- i. EFT to be directed to: **Federal Reserve Bank of New York**
- ii. Bank routing number: **021030004**
- iii. Bank account number receiving payment: **68010727**
- iv. SWIFT address: **FRNYUS33**

- v. Address: **Federal Reserve Bank of New York**  
**33 Liberty Street**  
**New York, NY 10045**
- vi. Field tag 4200 of the Fedwire message to read (for Fedwire payments):  
**D 68010727 Environmental Protection Agency**
- vii. Case number: **II-CERCLA-02-99-2015**
- viii. Amount of payment: **\$196,165.27**
- ix. Name of remitter: **ISP Environmental Services, Inc**
- x. Site name: **LCP Chemical Superfund Site**
- xi. Site/Spill identifier: **02 - HU**

To ensure that your payment is properly recorded, you are required to notify EPA contemporaneous with the payment. You may send either an email or a letter which references the date of the EFT, the payment amount, the name of the Site, the case number, and your name and address to:

Jon Gorin  
Remedial Project Manager  
New Jersey Remediation Branch  
Emergency & Remedial Response Division  
U.S. EPA – Region 2  
290 Broadway, 19th Floor  
New York, NY 10007-1866  
email: [gorin.jonathan@epa.gov](mailto:gorin.jonathan@epa.gov)

as well as to:

Frank Cardiello  
Assistant Regional Counsel  
Office of Regional Counsel  
U.S. EPA – Region 2  
290 Broadway, 17th Floor  
New York, NY 10007-1866  
email: [cardiello.frank@epa.gov](mailto:cardiello.frank@epa.gov)

and to:

Richard Rice  
U.S. EPA  
26 W. Martin Luther King Drive  
Attention: FINANCE  
MS: NWD  
Cincinnati, Ohio 45268  
emails: [rice.richard@epa.gov](mailto:rice.richard@epa.gov) and [AcctsReceivable.CINWD@epa.gov](mailto:AcctsReceivable.CINWD@epa.gov)

The United States reserves its right to recover any oversight costs incurred during that time

period covered by this accounting but not included in this Bill, and all other future response costs pursuant to the AOC.

EPA reaffirms its commitment to conduct appropriate and cost-effective oversight of work performed by consenting parties while ensuring protective cleanups. To this end, EPA would once again like to offer to discuss with you its plans for the oversight of ongoing work at the Site, and to provide you with the opportunity to suggest ways to effectively streamline the work and its oversight.

If you are interested in discussing work at the Site, or if you have questions regarding this Bill for Collection, please contact Jon Gorin at (212) 637-4361. Legal inquiries should be directed to Mr. Frank Cardiello, Assistant Regional Counsel, at (212) 637-3148.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Carole Petersen".

Carole Petersen, Chief  
New Jersey Remediation Branch

Enclosures



Summary of Response Costs Paid by EPA from 06/01/2012 through 12/31/2013  
LCP Chemicals, Inc. Superfund Site, Linden, NJ

**Payroll:**

This consists of direct EPA personnel charges for time spent by EPA employees in, among other activities, reviewing and commenting on deliverables and overseeing Settling Defendants adherence to the requirements of the AOC. See attached Payroll sections (Regional + Headquarters) of EPA's Itemized Cost Summary.

Total Payroll Costs: \$ 93,347.49

**Travel:**

This includes costs paid by EPA for travel (Regional + Headquarters) largely related to the National Remedy Review Board's review meeting related to the Site.

Travel Costs \$ 6,307.93

**Contract Lab Program (CLP)**

This includes costs paid by EPA for analytical work performed under the CLP.

CLP Costs \$ 2.18

**Response Action Contract – (RAC2)**

This item consists of costs paid by EPA in connection with work performed by Camp, Dresser & McKee ("CDM") for oversight of ISP's performance of the work required under the AOC.

CDM Costs: \$ 19,029.32

**Other Expenditures (OTH)**

This includes costs paid by EPA for ENSOFTEK to perform records management and document control of Site-related documents.

ENSOFTEK Costs \$ 3,170.20

**State Cooperative Agreement (SCA)**

This represents costs paid by EPA to the New Jersey Department of Environmental Protection to perform review of Site-related documents and to advise EPA on the Site's RI/FS.

SCA Costs: \$ 26,047.00

**Indirect Costs:**

Indirect Costs are disbursements from the Superfund for the operation and management of the Superfund Program which are not direct costs (*i.e.*, disbursements recorded in individual Superfund site accounts in EPA's financial management system). Indirect costs are allocated to particular Superfund sites by means of a methodology established by EPA Headquarters. See attached worksheet for calculation of indirect costs.

Total Indirect Costs: \$ 48,261.15

**TOTAL EPA COSTS IN THIS BILLING \$196,165.27**

